

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**MONIQUE DA SILVA MOORE,
MARYELLEN O'DONOHUE,
LAURIE MAYERS, HEATHER
PIERCE, KATHERINE WILKINSON,
on behalf of themselves and all others
similarly situated, and ZANETA
HUBBARD, on her own behalf.**

Plaintiffs,

v.

PUBLICIS GROUPE and MSLGROUP,

Defendants.

Civ. No.: 11-cv-1279 (ALC) (AJP)

**DECLARATION OF HEATHER PIERCE IN SUPPORT OF PLAINTIFFS' RULE
72(a) OBJECTION TO THE MAGISTRATE'S DECEMBER 14, 2012 RULING
REVOKING CLASS COUNSEL'S PRO HAC VICE**

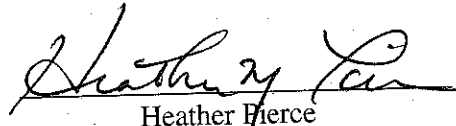
I, Heather Pierce, hereby declare as follows:

1. I make this Declaration based upon personal knowledge.
2. I am over 21 years of age and fully competent to make this Declaration. My address is 3757 W Street, NW, Washington, D.C. 20007. If called and sworn as a witness, I would testify competently as to the facts in this Declaration.
3. I am a Named Plaintiff in this action. I also opted in to the Equal Pay Act collective action on April 14, 2011.
4. I have been working with Janette Wipper of Sanford Heisler, LLP since March 2011, when I contacted her firm about joining the lawsuit against Publicis Groupe, S.A. and MSLGroup.
5. I chose Janette Wipper to be my counsel when I retained Sanford Heisler, LLP (then Sanford Wittels and Heisler, LLP) to represent me. Ms. Wipper was lead counsel on the case I wished to join and I wanted her to be my counsel.

6. I regularly seek Ms. Wipper's legal advice with respect to my case against Publicis Groupe, S.A. and MSLGroup.
7. I wish for Ms. Wipper to continue to represent me as counsel in this case and to be my counsel going forward. Should the case progress to trial, I would like Ms. Wipper to represent me through trial.
8. I feel that the Court's revocation of Ms. Wipper's admission as counsel in my case to the United States District Court for the Southern District of New York abridges my right to have the counsel of my choice represent me.

I declare under the penalties of perjury that the foregoing is true and accurate to the best of my knowledge and belief.

Dated: December 18, 2012
Location: Washington, DC


Heather Pierce